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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

In Re: Case No. 25-10088 WJL

Kingsborough Atlas Tree Surgery, Inc. Chapter 11

Debtor.

DECLARATION OF MICHAEL FALLON
IN SUPPORT OF MOTION FOR
AUTHORITY TO SELL PERSONAL
PROPERTY

I, Michael Fallon, declare that I am an attorney licensed to practice in this court and that I am personally familiar with the statements in this declaration. If called as a witness in these proceedings I could and would testify as follows:

I am informed and believe that on May 9, 2025, Anvil filed a Cross Complaint in the Sonoma County Superior Court, which has since been removed to the Bankruptcy Court, wherein Anvil prays that the court enter judgment rescinding the Asset Purchase Agreement on which Anvil relies to assert an ownership interest in the customer list the Debtor has requested authority to sell.

I declare under penalty of perjury the foregoing is true and correct and that this declaration was executed by me on May 30, 2025, at Santa Rosa, California.

/s/ Michael C. Fallon

Michael C. Fallon